
From: Armstrong, Scott (CRM) <Scott.Armstrong@usdoj.gov>
Sent: Thursday, August 31, 2023 10:43 AM
To: Cordova, Laura; [REDACTED] (CRM); Liolos, John (CRM); mford@fordobrien.com; Reyes, Luis; jsutton@ashcroftlawfirm.com; philip@hilderlaw.com; tate@hilderlaw.com; Stephanie McGuire; houstonstrialattorney@gmail.com; edward@msblawyers.com; Murtha, Michael; neal@nealdavislaw.com; zach@fertittalaw.net; chip@chiplewislaw.com; michelle@chiplewislaw.com; Lauren@chiplewislaw.com; bill@stradleylaw.com; Erin Epley; Zachary Fertitta; jsolano@fordobrien.com
Cc: [REDACTED] (CRM)
Subject: RE: Production 2: United States v. Constantinescu et al, No. 4:22-CR-00612
Attachments: Load Ready Email Crosswalk.xlsx

****RECEIVED FROM EXTERNAL SENDER – USE CAUTION****

Attached is a crosswalk for the load-ready emails we produced on Monday. As to the question about the IP analysis, the underlying documents are DOJ-PROD-0000119906, DOJ-PROD-0000119911, DOJ-PROD-0000119916, DOJ-PROD-0000119920, DOJ-PROD-0000237998, DOJ-PROD-0000290483, and DOJ-PROD-0000358847.

From: Cordova, Laura <lcordova@jw.com>
Sent: Monday, August 28, 2023 5:28 PM
To: [REDACTED] (CRM) [REDACTED]@usdoj.gov>; Armstrong, Scott (CRM) <Scott.Armstrong@usdoj.gov>; Liolos, John (CRM) <John.Liolos@usdoj.gov>; mford@fordobrien.com; Reyes, Luis <lreyes@ashcroftlawfirm.com>; jsutton@ashcroftlawfirm.com; philip@hilderlaw.com; tate@hilderlaw.com; Stephanie McGuire <stephanie@hilderlaw.com>; houstonstrialattorney@gmail.com; edward@msblawyers.com; Murtha, Michael <mmurtha@jw.com>; neal@nealdavislaw.com; zach@fertittalaw.net; chip@chiplewislaw.com; michelle@chiplewislaw.com; Lauren@chiplewislaw.com; bill@stradleylaw.com; Erin Epley <erin@chiplewislaw.com>; Zachary Fertitta <zach@fertittalaw.net>; jsolano@fordobrien.com
Cc: [REDACTED] (CRM) [REDACTED]@usdoj.gov>
Subject: [EXTERNAL] RE: Production 2: United States v. Constantinescu et al, No. 4:22-CR-00612

Counsel,

Please let us know when you intend to produce the email attachments that were not previously produced. Your cover letter states that all of the materials you sent us today were previously produced. As noted in our prior correspondence and discussed in our telephone conversation, for several emails produced, the attachments were missing and had never been produced. Please let us know when you intend to produce those email attachments.

Also, please provide a crosswalk of the DOJ-PROD numbers that these newly produced documents replace.

Best regards,
Laura

Laura M. Kidd Cordova
M: (202) 340-8472

From: [REDACTED] (CRM) [REDACTED]@usdoj.gov>

Sent: Monday, August 28, 2023 3:41 PM

To: Armstrong, Scott (CRM) <Scott.Armstrong@usdoj.gov>; Liolos, John (CRM) <John.Liolos@usdoj.gov>; mford@fordobrien.com; Reyes, Luis <lreyes@ashcroftlawfirm.com>; Peele, Christopher <CPeele@ashcroftlawfirm.com>; jsutton@ashcroftlawfirm.com; philip@hilderlaw.com; tate@hilderlaw.com; Stephanie McGuire <stephanie@hilderlaw.com>; houstontrialattorney@gmail.com; edward@msblawyers.com; Cordova, Laura <lcordova@jw.com>; Murtha, Michael <mmurtha@jw.com>; cca@akersfirm.com; neal@nealdavislaw.com; zach@fertittalaw.net; chip@chiplewislaw.com; michelle@chiplewislaw.com; Lauren@chiplewislaw.com; erosen@fnf.law; bill@stradleylaw.com; Erin Epley <erin@chiplewislaw.com>; Zachary Fertitta <zach@fertittalaw.net>; jsolano@fordobrien.com

Cc: [REDACTED] (CRM) [REDACTED]@usdoj.gov>

Subject: RE: Production 2: United States v. Constantinescu et al, No. 4:22-CR-00612

****RECEIVED FROM EXTERNAL SENDER – USE CAUTION****

Counsel,

Attached is a cover letter and index for a reproduction of emails and their attachments in load-ready format, which was shipped to your offices today. [REDACTED] is the password to unlock the flash drive.

Please let me know if you have trouble accessing.

Sincerely,

[REDACTED]
Paralegal – Contractor (CACI)
U.S. Department of Justice – Criminal Division, Fraud Section
1400 New York Avenue, NW, Washington, DC 20005
[REDACTED]

* * * * *

[prior email chain omitted]

Excerpt of crosswalk

	Previously Produced DOJ-PROD Bates	PRODUCTION BEGDOC	PRODUCTION ENDDOC
181	DOJ-PROD-0000318304-DOJ-PROD-0000318311	DOJ-EMAILS-0000000804	DOJ-EMAILS-0000000810
182	DOJ-PROD-0000318312-DOJ-PROD-0000318314	DOJ-EMAILS-0000000811	DOJ-EMAILS-0000000813
183	DOJ-PROD-0000318315-DOJ-PROD-0000318317	DOJ-EMAILS-0000000814	DOJ-EMAILS-0000000815
184	DOJ-PROD-0000318318-DOJ-PROD-0000318319	DOJ-EMAILS-0000000816	DOJ-EMAILS-0000000817
185	DOJ-PROD-0000318320-DOJ-PROD-0000318321	DOJ-EMAILS-0000000818	DOJ-EMAILS-0000000819
186	DOJ-PROD-0000318322	DOJ-EMAILS-0000000820	DOJ-EMAILS-0000000820
187	DOJ-PROD-0000318323-DOJ-PROD-0000318323	DOJ-EMAILS-0000000821	DOJ-EMAILS-0000000821
188	DOJ-PROD-0000318346-DOJ-PROD-0000318347	DOJ-EMAILS-0000000822	DOJ-EMAILS-0000000822
189	Attachment; Not produced originally	DOJ-EMAILS-0000000823	DOJ-EMAILS-0000000823
190	Attachment; Not produced originally	DOJ-EMAILS-0000000824	DOJ-EMAILS-0000000824
191	Attachment; Not produced originally	DOJ-EMAILS-0000000825	DOJ-EMAILS-0000000825
192	Attachment; Not produced originally	DOJ-EMAILS-0000000826	DOJ-EMAILS-0000000826
193	DOJ-PROD-0000318349-DOJ-PROD-0000318351	DOJ-EMAILS-0000000827	DOJ-EMAILS-0000000828
194	DOJ-PROD-0000318353-DOJ-PROD-0000318355	DOJ-EMAILS-0000000829	DOJ-EMAILS-0000000830
195	DOJ-PROD-0000318353-DOJ-PROD-0000318355	DOJ-EMAILS-0000000831	DOJ-EMAILS-0000000831
196	DOJ-PROD-0000318357-DOJ-PROD-0000318357	DOJ-EMAILS-0000000832	DOJ-EMAILS-0000000832
197	DOJ-PROD-0000318358-DOJ-PROD-0000318358	DOJ-EMAILS-0000000833	DOJ-EMAILS-0000000833
198	DOJ-PROD-0000329503	DOJ-EMAILS-0000000834	DOJ-EMAILS-0000000837
199	DOJ-PROD-0000329507	DOJ-EMAILS-0000000838	DOJ-EMAILS-0000000840
200	DOJ-PROD-0000329510	DOJ-EMAILS-0000000841	DOJ-EMAILS-0000000841
201	DOJ-PROD-0000329513	DOJ-EMAILS-0000000842	DOJ-EMAILS-0000000844
202	DOJ-PROD-0000329882	DOJ-EMAILS-0000000845	DOJ-EMAILS-0000000845
203	DOJ-PROD-0000329883	DOJ-EMAILS-0000000846	DOJ-EMAILS-0000000846
204	DOJ-PROD-0000334899	DOJ-EMAILS-0000000847	DOJ-EMAILS-0000000847
205	DOJ-PROD-0000334898	DOJ-EMAILS-0000000848	DOJ-EMAILS-0000000848
206	DOJ-PROD-0000334897	DOJ-EMAILS-0000000849	DOJ-EMAILS-0000000849
207	DOJ-PROD-0000330414	DOJ-EMAILS-0000000850	DOJ-EMAILS-0000000850
208	DOJ-PROD-0000330415	DOJ-EMAILS-0000000851	DOJ-EMAILS-0000000851